

MACHI & ASSOCIATES, P.C.  
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ATTORNEY FOR DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**Jason Allan Makoutz and  
Kari Marjorie Makoutz  
Debtors**

**Carvana, LLC  
Movant**

**vs.**

**Jason Allan Makoutz and  
Kari Marjorie Makoutz,  
Debtor and Tim Truman, Trustee  
Respondents**

§ **CASE NO. 18-41677-MXM-13**

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**Preliminary Hearing  
December 5, 2018 at 9:30 A.M.**

**ANSWER TO AMENDED MOTION FOR RELIEF FROM AUTOMATIC STAY,  
OR IN THE ALTERNATIVE FOR ADEQUATE PROTECTION**

TO THE HONORABLE JUDGE OF SAID COURT:

**COMES NOW**, Debtors herein, Jason Allan Makoutz and Kari Marjorie Makoutz, and files this Answer to Motion for Relief from the Automatic Stay, or in the Alternative for Adequate Protection and would respectfully show the Court as follows:

1. Debtors admit the allegations contained in paragraphs 1, 2 & 3.
2. Debtors have insufficient knowledge to either admit or deny the allegations contained in paragraph 4.

3. Debtor denies the allegations contained in paragraphs 5 & 6, in that there is equity in the vehicle and it is necessary for reorganization. The Debtors further state that the property described as a 2015 Nissan Versa Note is protected by insurance and will be further protected by all payments being made pursuant to the Contract and/or the Chapter 13 Plan.
4. Debtors reserve the right to amend this Answer pursuant to United States Bankruptcy Rules.

**WHEREFORE**, Debtors pray that the relief sought by Movant, **Carvana, LLC**, be denied and for such other and further relief the court deems just and proper.

SIGNED this the 20th day of November, 2018.

Respectfully submitted,  
MACHI & ASSOCIATES, P.C.

By: /s/ Daniel S. Wright  
**Daniel S. Wright**  
**State Bar No. 24037742**

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ATTORNEYS FOR DEBTORS

**CERTIFICATE OF SERVICE**

This is to certify that the above and foregoing Answer to Motion for Relief from Automatic Stay was served by Electronic Mail or First Class United States Mail, postage prepaid, on all interested parties, all parties requesting notice and on each of the following parties identified below on this the 20th day of November, 2018:

Mr. Tim Truman  
Chapter 13 Trustee  
6851 N.E. Loop 820, Suite 300  
North Richland Hills, TX 76180

William T. Neary  
U.S. Trustee  
1100 Commerce Street, Rm 9C60  
Dallas, TX 75242

Mr. Travis H. Gray  
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Attorneys for Movant

/s/ Daniel S. Wright  
**Daniel S. Wright**